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*Attorneys for Defendant
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANT OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
OPPOSITION TO PLAINTIFF WAYMO'S
MOTION FOR ORDER TO SHOW CAUSE
(DKT. 847)**

Courtroom: 8, 19th Floor
Judge: Honorable William Alsup
Trial Date: October 10, 2017

Filed/Lodged Concurrently with:

1. Declaration of Hong-An Vu
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto Trucking”) submits this motion for an order to file under seal its Opposition to Plaintiff Waymo LLC’s Motion for Order to Show Cause (Dkt. 847) (“Opposition”). Specifically, Otto Trucking requests an order granting leave to file under seal the confidential portions of the following document:

Document	Portions to Be Filed Under Seal
Opposition	Highlighted Portions

The highlighted portions of the Opposition contain highly confidential, sensitive business information of Otto Trucking relating to terms of Otto Trucking’s agreements, corporate structure, and financial information and may contain such highly confidential, sensitive business information of Uber relating to Uber’s agreements. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. If this information were made public, Otto Trucking’s competitors and counterparties would have insight into how Otto Trucking structures its business agreements, allowing them to modify their own business strategy. Otto Trucking’s competitive standing could be significantly harmed.

Otto Trucking’s request to seal is narrowly tailored to those portions of the Motion’s supporting documents that merit sealing.

Dated: July 24, 2017

Respectfully submitted,

By: /s/ Hong-An Vu

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on July 24, 2017. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 24th day of July 2017 in Los Angeles, California.

/s/ Hong-An Vu
Hong-An Vu